

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:12-CR-00107-01-BR

v.

CHRISTOPHER COOL WILMER et. al.,

PROTECTIVE ORDER

Defendant.

This matter came before the Court upon motion by the government for an order pursuant to Rule 16(d)(1), Fed. R. Crim. P., as well as the privacy protection measures mandated by 18 U.S.C. § 3509(d) when a case involves a person under the age of eighteen years who is alleged to be a victim of a crime of sexual exploitation, or a witness to a crime committed against another person.

IT IS HEREBY ORDERED that defendant and counsel of record shall not disclose to any person, with the exception of those persons employed by the attorney who are necessary to assist counsel of record during investigation and preparation for trial or sentencing, the affidavits in support of the complaint and search warrant or any of the discovery provided by the government including: any personal identifying information or statement related to a minor victim or any witness.

IT IS FURTHER ORDERED that defendant and his counsel of record shall not copy, display, distribute, reproduce or publish the protected affidavits and discovery material, except

that copies may be made for use by those employed by the attorney who are necessary to assist counsel of record during investigation and preparation for trial.

IT IS FURTHER ORDERED that the defendant's attorney, and those employed by defendant's attorney who are necessary to assist counsel of record, maintain custody and control over the protected material and all copies thereof, and they shall preclude the defendant from retaining copies or having unsupervised access to the below-listed specific categories of material at any time:

- (1) Personal identifying information of the civilian witnesses and victims;
- (2) Photographs or images of civilian witnesses and/or victims;
- (3) Information downloaded from victim cell phones, including but not limited to contact lists, text messages, text logs, jpegs, photographs [Bates pages 127-146 and 147-182];
- (4) Pornographic contents from Duy Nguyen's cell phone download disc, or printouts of the pornographic content from the disc [Bates pages 106 (volume 2)], subject to a review of the material by defense counsel and any objection as to the protective order over this material to be resolved by the Court or by a stipulation of the parties that specific material in this category may be provided to defendant;
- (5) Internet postings/pictures of the victims from sex-trafficking websites, including but not limited to: Backpage.com, escort.com, cityxguide.com, Sipsap, eroticmugshots.com [Bates pages 183-226], subject to a review of the material by defense counsel and any objection

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as to the protective order over this material to be resolved by the Court or by a stipulation of the parties that specific material in this category may be provided to defendant

DATED this _____ day of April 2012.

The Honorable Anna J. Brown
UNITED STATES DISTRICT COURT JUDGE

Respectfully submitted,

S. AMANDA MARSHAL
United States Attorney
District of Oregon

s/ Leah K. Bolstad
LEAH K. BOLSTAD, OSB #05203
Assistant United States Attorney